

BOIES SCHILLER FLEXNER LLP
Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

SUSMAN GODFREY L.L.P.
William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN
John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel
listed in signature blocks below*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

Case No. 4:20-cv-03664-YGR-SVK

JOINT STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINES FOR
EXPERT DISCOVERY AND CLASS
CERTIFICATION

Judge: Honorable Yvonne Gonzalez Rogers

v.
GOOGLE LLC,
Defendant.

Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Defendant Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, Google seeks a modest extension of time to serve its rebuttals to certain of Plaintiffs’ opening expert reports (from May 20, 2022 to June 7, 2022);

WHEREAS, Google has offered Plaintiffs a reciprocal extension of time to serve their rebuttals to certain of Google’s opening expert reports (from May 20, 2022 to June 7, 2022);

WHEREAS, the Parties agree that there is good cause for the Parties’ requested extensions in light of the volume of materials submitted with certain of the Parties’ opening expert reports;

WHEREAS, the Parties have agreed to extend the deadline for the Parties’ rebuttals to certain of the Parties’ opening expert reports (from May 20, 2022 to June 7, 2022);

WHEREAS, the Parties seek a modest extension of certain deadlines for the submission of briefing regarding Plaintiffs’ motion for class certification;

WHEREAS, the Parties agree that there is good cause for their requested extension in order to provide the Parties with sufficient time to address the Parties’ rebuttal expert reports;

WHEREAS, the Parties have agreed to extend the deadline for Plaintiffs’ motion for class certification (from June 16, 2022 to June 20, 2022), Google’s opposition to Plaintiffs’ motion for class certification (from August 4, 2022 to August 5, 2022), and Plaintiffs’ reply in support of their motion for class certification (from August 25, 2022 to August 26, 2022);

WHEREAS, the Parties’ agreement to extend certain deadlines regarding Plaintiffs’ motion for class certification will not impact the currently scheduled September 20, 2022 hearing.

NOW THEREFORE, the Parties stipulate as follows:

1. The deadline for Google to serve rebuttals to the Expert Report of Jonathan E. Hochman is extended from May 20, 2022 to June 7, 2022.
2. The deadline for Google to serve rebuttals to certain sections of the Expert Report of Bruce Schneier regarding fingerprinting, entropy, and personal information is extended from May 20, 2022 to June 7, 2022.
3. The deadline for Plaintiffs to serve rebuttals to the Expert Report of Dr. Giorgios Zervas is extended from May 20, 2022 to June 7, 2022.
4. The deadline for Plaintiffs' motion for class certification is extended from June 16, 2022 to June 20, 2022.
5. The deadline for Google's opposition to Plaintiffs' motion for class certification is extended from August 4, 2022 to August 5, 2022.
6. The deadline for Plaintiffs' reply in support of their motion for class certification is extended from August 25, 2022 to August 26, 2022.
7. The Parties agree to keep the currently scheduled September 20, 2022 hearing for Plaintiffs' motion for class certification.

DATED: May 11, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Andrew Schapiro

Andrew H. Schapiro (admitted pro hac vice)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted pro hac vice)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

SUSMAN GODFREY LLP

/s/ Amanda Bonn

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I Street NW, Suite 900
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
Washington D.C., 20005
Tel: (202) 538-8000
Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: (415) 875-6600
Fax: (415) 875-6700

Attorneys for Defendant Google LLC

James W. Lee (*pro hac vice*)
jlee@bsfllp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsfllp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Tel: (305) 539-8400
Fax: (305) 539-1304

William Christopher Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
Alexander P. Frawley (*pro hac vice*)
afrawley@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
Tampa, FL 33602
Tel: (813) 223-5505
Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)
mram@forthepeople.com
MORGAN & MORGAN, P.A.
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Stipulation. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: May 11, 2022

By /s/ Andrew Schapiro

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

[PROPOSED] ORDER

Judge: Honorable Yvonne Gonzalez Rogers

Pursuant to stipulation of the Parties, the Court revises the case schedule as follows:

Scheduled Event	Current Date	New Date
Rebuttal Expert Reports (for all except (i) Google's rebuttals to Jonathan E. Hochman's opening report and certain sections of Bruce Schneier's opening report; and (ii) Plaintiffs' rebuttals to Dr. Georgios Zervas)	May 20, 2022 ¹	No change: May 20, 2022 ²
Google's rebuttals to Jonathan E. Hochman's opening report and certain sections of Bruce Schneier's opening report; and Plaintiffs' rebuttals to Dr. Georgios Zervas	May 20, 2022	June 7, 2022
Close of Expert Discovery	August 25, 2022	No change: August 25, 2022

¹ By agreement of the parties, Google's deadline for serving rebuttals to the expert report of Michael J. Lasinski is May 27, 2022.

² By agreement of the parties, Google's deadline for serving rebuttals to the expert report of Michael J. Lasinski is May 27, 2022.

Class Certification Motion	Motion: June 16, 2022 Opp'n: August 4, 2022 Reply: August 25, 2022	Motion: June 20, 2022 Opp'n: August 5, 2022 Reply: August 26, 2022
Class Certification Hearing	September 20, 2022	No change: September 20, 2022

IT IS SO ORDERED.

DATED: _____, 2022

Hon. Yvonne Gonzalez Rogers
United States District Judge